

1           **JENNY L. FOLEY, Ph.D., ESQ.**  
2           Nevada Bar No. 9017  
3           E-mail: jfoley@hkm.com  
4           **MARTA D. KURSHUMOVA, ESQ.**  
5           Nevada Bar No. 14728  
6           E-mail: mkurshumova@hkm.com  
7           **HKM EMPLOYMENT ATTORNEYS LLP**  
8           1785 East Sahara, Suite 300  
9           Las Vegas, Nevada 89104  
10          Tel: (702) 625-3893  
11          Fax: (702) 625-3893  
12          *Attorneys for Plaintiff*

7           **UNITED STATES DISTRICT COURT**  
8           **DISTRICT OF NEVADA**

9           KEITH PAUL, an Individual,

10          Plaintiff,

11          vs.

12          CITY OF HENDERSON, DOES I -X; ROE  
13          CORPORATIONS I -X,

14          Defendant.

15           CASE NO.: 2:19-cv-00996-GMN-DJA

16           **STIPULATION AND ORDER FOR**  
17           **DISMISSAL**

18           Plaintiff Keith Paul (“Plaintiff”), by and through his attorneys, JENNY L. FOLEY,  
19          Ph.D., ESQ., and MARTA D. KURSHUMOVA, ESQ. of the law firm HKM EMPLOYMENT  
20          ATTORNEYS LLP, and Defendant City of Henderson, by and through its attorney, BRIAN R.  
21          REEVE, ESQ. and KRISTINA E. GILMORE, ESQ. of the CITY OF HENDERSON CITY  
22          ATTORNEY’S OFFICE, hereby stipulate and agree that, consistent with the requirements of  
23          F.R.C.P. 41(a)(1)(A)(ii), this matter shall be Dismissed with Prejudice as to the First  
24          (Discrimination, Retaliation and Wrongful Termination in Violation of the National Labor  
Relations Act of 1935), Second (Retaliatory Discharge in Violation of Public Policy and NRS  
614.090) and Third (Retaliatory Discharge in Violation of NRS 288.270) Causes of Action.  
The Parties stipulate and agree that the Fourth Cause of Action (Defamation) shall be Dismissed  
without Prejudice. The Parties stipulate and agree that each party shall bear its own attorney’s

1 fees and costs. In light of the parties' stipulation to dismiss this case, the parties respectfully  
2 request that the Early Neutral Evaluation scheduled for October 3, 2019, be vacated.

3 Dated: September 24, 2019  
4

5 CITY OF HENDERSON

6 By: /s/ Brian R. Reeve  
7 BRIAN R. REEVE (#10197)  
8 Assistant City Attorney  
9 KRISTINA E. GILMORE (#11564)  
10 Assistant City Attorney  
11 240 Water Street, MSC 144  
12 Henderson, Nevada 89015  
13 Telephone: (702) 267-1231  
14 Facsimile: (702) 267-1201  
15 Email: [brian.reeve@cityofhenderson.com](mailto:brian.reeve@cityofhenderson.com)  
16 Attorneys for Defendant

17 Dated: September 24, 2019  
18

HKM EMPLOYMENT ATTORNEYS LLP

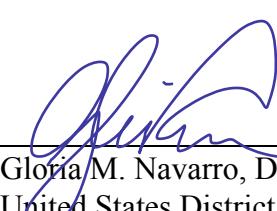
19 By: /s/ Jenny Foley  
20 Jenny L. Foley (#9017)  
21 Marta D. Kurshumova (#14728)  
22 1785 East Sahara, Suite 300  
23 Las Vegas, Nevada 89104  
24 Telephone: (702) 625-3893  
Facsimile: (702) 625-3895  
Email: [jfoley@hkm.com](mailto:jfoley@hkm.com)  
Email: [mkurshumova@hkm.com](mailto:mkurshumova@hkm.com)  
Attorneys for Plaintiff

**ORDER**

19  
20 IT IS SO ORDERED:  
21

22 Dated this 25 day of September, 2019  
23

24



Gloria M. Navarro, District Judge  
United States District Court